

REMARKS

This Amendment is submitted in reply to the Office Action dated March 24, 2006, issued in connection with the above-identified application. Claims 1-18 and 35 are all the claims presently pending in the application. Claims 19-34 have been withdrawn from consideration. With this Response, claims 1, 14-16 and 35 have been amended. No new matter has been introduced as a result of the changes made to the claims. Thus, entry and favorable reconsideration are respectfully requested.

I. Response To 112 Rejections

Claims 1, 14-16 and 35 stand rejected under 35 U.S.C. §112, first paragraph, for failing to comply with the written description requirement under U.S Patent Law. More specifically, the Examiner alleges that claims 1, 14-16 and 35 recite a “controlling recording means,” which is vaguely described in paragraphs 11-26 of the specification. Additionally, claims 1 and 14-16 stand rejected under 35 U.S.C. §112, second paragraph, for being indefinite. Specifically, the Examiner alleges the term “recording control means,” and the phrase “such that” are indefinite.

With regard to §112, first paragraph rejections to claims 1, 14-16 and 35, the Applicants respectfully disagree that the description of the “controlling recording means” in the specification is inadequate. The Examiner, in maintaining the rejection, notes only the paragraphs in the “Summary Of The Invention” section of the application. However, this section provides more of a high-level description. The Applicant suggests that the application as a whole sufficiently describes the “controlling recording means” of the present invention. More specifically, in the “Detailed Description Of The Invention” section of the application the registering and storing of personal information as well as attribute information is described in detail. In particular, the Applicants direct the Examiner’s attention to the description of Figures 2-11, which describes the “controlling recording means” in sufficient detail to allow one of ordinary skill in the art make and use the invention.

With regard to the §112, second paragraph rejections to claims 1 and 14-16, the Applicants have herein amended the claims to more clearly define the invention, as suggested by the Examiner.

Based on the foregoing, the §112 rejections are believed to be overcome, and the Applicants respectfully request that the rejections be withdrawn.

II. Response To 103 Rejections

Claims 1-18 and 35 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Clark (U.S. Patent No. 6,351,738, hereafter “Clark”) in view of Ginter et al. (U.S. Patent No. 6,658,568, hereafter “Ginter”). The Applicants respectfully traverse the above rejections for the following reasons.

Specifically, neither Clark nor Ginter teach or suggest a “substituting step or means for substituting personal information of a user contained in a first information of which input is controlled by a first input/output control means with a second information corresponding to the personal information of the user on a one-to-one basis.” This feature of the present invention is clearly recited in claim 1 and similarly recited in claims 14-16 and 35 (as amended).

Clark discloses generally a collective business system that includes participants engaged in common fields of business endeavor. As correctly noted by the Examiner, Clark fails to teach or suggest the “substitute step or means” of the present invention (see, Office Action, pages 6-7). The Examiner, however, relies on Ginter for teaching or suggesting the claim “substitute step or means” recited in the above claims. After a detailed review of Ginter, the Applicants disagree with the Examiner interpretation of Ginter.

Ginter discloses a trusted infrastructure support system that provides secure, automated transaction processing for use in electronic commerce. The Examiner, in particular, relies on Figures 17A-17F, col. 28, lines 37-49 and col. 32, line 7 of Ginter for teaching or suggesting the “substitute step or means” of the present invention. However, as noted by the Examiner, Ginter describes merely protecting a consumer’s identity by not revealing personal information to a usage clearinghouse. Specifically, the usage clearinghouse 300 provides a summary report 304b to advertisers 306 that does not reveal the consumer’s identity but provides the advertisers with valuable information about consumer’s viewing habits (see, Ginter, col. 28, lines 40-49). Conversely, the recited “substitute step or means” includes an active step of substituting personal information with information that corresponds to the personal information. Ginter neither teaches nor suggests this active step of substitution. To this end, Ginter can not render obvious the “substitution step or means” of the present invention.

Accordingly, even if it were appropriate to combine the teachings of Clark and Ginter, the combination still does not teach or suggest all the cited features in independent claims 1, and 14-16 and 35. Specifically, Clark and Ginter individually or in combination fail to teach or suggest the "substitute step or means" of the present invention. Likewise, dependent claim 2-13 and 17-18 are also believed to be distinguishable over Clark in view of Ginter based on their dependency from independent claims 1 and 16.

III. Conclusion

In light of the above, the Applicants respectfully submit that all the claims in the present application are patentable over the prior art of record. Therefore, the Applicants respectfully request that a timely Notice of Allowance be issued in this case. If additionally fees are due in connection with this application as a whole, the Commissioner is authorized to deduct such fees from deposit account no. 02-1818.

Respectfully submitted,

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